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John Rose, Jr. (JR-4389)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

LEHMAN BROTHERS HOLDINGS INC., et al.,
Debtors.

Chapter 11

Case No. 08-13555(JMP)
(Jointly Administered)

OPPOSITION TO DISALLOWANCE OF CLAIMANT'S PROOFS OF CLAIM BY
DEBTOR'S FORTY-SIXTH OMNIBUS OBJECTION TO CLAIMS (NO DEBTOR
CLAIMS)

TO: THE HONORABLE JAMES M. PECK, JUDGE:

By its Forty-Sixth Omnibus Objection to Claims (No Debtor Claims) dated September 24, 2010, the Debtor, acting by Weil, Gotshal & Manges, LLP, its counsel, filed with this Court its objection to three (3) Proofs of Claims submitted by Claimant Julian Iragorri, being Proofs of Claim No. 6910, No. 6911, and No. 6912.

Thereafter, communications as between Claimant Iragorri and Debtors' counsel were had, leading to a determination by Debtors' counsel to withdraw, without prejudice, their objection to Claimant's submitted Proofs of Claim.

Attached hereto as Exhibit A are emails evidencing the conversations or communications as between Claimant Iragorri and Debtors' counsel, and the referenced withdrawal of objection, without prejudice, made on October 14, 2010. In addition, Claimant, by his counsel, includes, as Exhibit B, a copy of a letter dated October 18, 2010 sent to Debtors' counsel, including Attorney Encarnacion and Attorney Waisman, confirming and affirming the decision by said counsel to withdraw their objection to Claimant's three (3) Proofs of Claim.

Wherefore, Claimant, by his counsel, prays the Court enter an order confirming the withdrawal of Debtor's Objection to his Proofs of Claim, No. 6910. No. 6911, and No. 6912, without prejudice, all as set forth in the attached exhibits.

Dated at Hartford, Connecticut

October 20, 2010

By /s/ John Rose, Jr.
John Rose, Jr.
Crumbie Law Group, LLC
(JR-4389)
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Hartford, CT 06103
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Exhibit A



CRUMBIE
LAW GROUP
LLC

CORPORATE GOVERNANCE GROUP
MUNICIPAL AND BUSINESS LITIGATION GROUP
INVESTIGATIVE SERVICES GROUP

John Rose, Esq.
Crumbie Law Group
280 Trumbull Street, Fl 21
Hartford, CT 06103
October 18, 2010

Erik Encarnacion, Esq.
Litigation Associate
Weil, Gotshal & Manges LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201

Re: Three Proofs of Claim filed by Julian Iragorri

Dear Mr. Encarnacion:

Please know that this office was contacted by Julian Iragorri, a former Lehman employee, who filed three (3) Proofs of Claim in the bankruptcy titled In re Lehman Brothers Holdings Inc., et al, Chapter 11, Case No. 08-13555 (JMP). Your law firm objected to Mr. Iragorri's Proofs of Claim by a pleading dated September 24, 2010 (set for a hearing on October 27, 2010) being Weil Gotshal's "Forty-Sixth Omnibus Objection to Claims (No Debtor Claims)."

I have an email dated October 14, 2010 from you to Mr. Iragorri, wherein you advise him that said email "...is to confirm [per your conversation with him of said date] that Lehman will agree to withdraw without prejudice, its objection (Omnibus Objection #46) with respect to proofs of claim numbers 6910, 6911 and 6912) and reserves the right to object to any and all claims on any basis in the future."

This, therefore, is to advise, on behalf of Mr. Iragorri, that no formal opposition to the Debtor's objection to those said Proofs of Claim filed by him is required and none will be made by the October 27, 2010 deadline date, and that said Proofs of Claim are deemed acceptable by the Creditor/its attorneys so far as the Omnibus Objection No. 46 is concerned.

Yours truly,

A handwritten signature in black ink, appearing to read 'John Rose, Esq.'

John Rose, Esq.

Exhibit B

From: Crumbie, Andrew R.
Sent: Friday, October 15, 2010 6:44 AM
To: Alexandre, Henri; Rose, John; Hamilton, Heidi
Subject: Fwd: Lehman -- Withdrawal without Prejudice

Andrew R. Crumbie
Crumbie Law Group, LLC
280 Trumbull St. 21st Floor
T 860-725-0025
F 860-760-0308
E andrew@crumbielaw.com
www.crumbielaw.com

From: Encarnacion, Erik <Erik.Encarnacion@weil.com>
To: Iragorri, Julian: Barclays Wealth
Cc: Profitt, Gail <Gail.Profitt@weil.com>
Sent: Thu Oct 14 19:00:19 2010
Subject: Lehman -- Withdrawal without Prejudice

Julian,

Per our conversation today, this e-mail is to confirm that Lehman will agree to withdraw, without prejudice, its objection (omnibus objection #46) with respect to proofs of claim numbers 6910, 6911, and 6912 and reserves the right to object to any and all claims on any basis in the future.

Regards,

Erik Encarnacion